



U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT
OFFICE OF INSPECTOR GENERAL

April 26, 2013

**MEMORANDUM NO:
2013-PH-1803**

Memorandum

TO: Dane M. Narode
Associate General Counsel for Program Enforcement, CACC

Dennis G. Bellintier
Director, Office of Public Housing, Pennsylvania State Office, 3APH

//signed//

FROM: John P. Buck
Regional Inspector General for Audit, 3AGA

SUBJECT: Review of the Philadelphia Housing Authority's Compliance with Federal
Lobbying Disclosure Requirements and Restrictions

INTRODUCTION

We conducted a review of the Philadelphia Housing Authority's compliance with Federal lobbying disclosure requirements and restrictions based on concerns noted during our ongoing internal audit of the U.S. Department of Housing and Urban Development's (HUD) oversight of public housing authorities' compliance with Federal lobbying disclosure requirements and during the audit resolution of audit report number 2011-PH-1007.¹ Our review objective was to determine whether the Authority complied with Federal lobbying disclosure requirements and restrictions.

METHODOLOGY AND SCOPE

To accomplish our objective, we interviewed and held discussions with HUD program officials and HUD's Philadelphia Regional Counsel. In addition we obtained and reviewed the following:

- Lobbying certifications and disclosures, and expense records relevant to our review for the period of January 2006 through September 2012.

¹ HUD OIG audit report number 2011-PH-1007, dated March 10, 2011, "The Philadelphia, PA, Housing Authority Did Not Comply with Several Significant HUD Requirements and Failed To Support Payments for Outside Legal Services"

- Expense records and payments for lobbying noted for two firms (American Continental Group, LLC, and Gmerek Government Relations, Inc.).
- Invoices for legal services obtained from the enforcement of an Office of Inspector General (OIG) subpoena issued to the Authority on December 10, 2010.²
- Audit resolution documentation from our prior audit of the Authority's payments for outside legal services (2011-PH-1007).
- Forensic audit report of the Authority prepared by KPMG, LLP, dated September 26, 2012.
- The U.S. Senate Office of Public Records Lobbying Disclosure Act database.

Our review covered transactions and events that occurred during the period January 1, 2006, through September 30, 2012. This was a limited scope review. Therefore, it was not performed in accordance with generally accepted government auditing standards.

BACKGROUND

The U.S. Housing Act of 1937 initiated the Nation's public housing program. That same year, the City of Philadelphia established the Philadelphia Housing Authority under Pennsylvania laws to address housing issues affecting low-income persons. The Authority's main administrative office is located at 12 South 23rd Street, Philadelphia, PA. The Authority is the Nation's fourth largest public housing authority and owns and operates more than 15,500 affordable housing units, serving about 80,000 people in Philadelphia. The Authority employs 1,400 people and has an annual budget of approximately \$371 million. It receives most of its funding from HUD. A small part of the budget (\$1.5 million in State and Federal funds) is received in the form of grants. The Authority reports that it bills approximately \$24 million in rents to its residents. The Authority operates on a March 31 fiscal year.

Before March 4, 2011, a five-member board of commissioners governed the Authority. On March 4, 2011, the Authority's board of commissioners resigned, and HUD took control of the Authority. At that time, HUD Secretary Shaun Donovan appointed HUD's former Chief Operating Officer, Estelle Richman, to serve as the sole member of the Authority's board and Michael P. Kelly as HUD's administrative receiver. The cooperative endeavor agreement formalizing HUD's takeover of the Authority remains in effect until the HUD Deputy Secretary and the mayor of Philadelphia mutually determine that the Authority has built sufficient capacity to be self-supporting. A new nine-member board of commissioners nominated by Philadelphia Mayor Michael Nutter was appointed in April 2013.

The Authority's executive director during most of the period we reviewed was Carl R. Greene. The Authority's board of commissioners terminated Mr. Greene's employment, effective September 23, 2010, and hired Mr. Michael P. Kelly to serve as interim executive director,

² The OIG derives its subpoena power from 5 U.S.C. App. 3 § 6(a)(4).

effective December 6, 2010. On August 8, 2011, Mr. Kelly began serving as the Authority's permanent executive director. Between the termination of Mr. Greene's employment and the hiring of Mr. Kelly, three assistant executive directors managed the day-to-day operations of the Authority. On June 15, 2012, Mr. Kelly resigned as the executive director and Mr. Kelvin A. Jeremiah was appointed as the acting executive director, effective June 16, 2012. Mr. Jeremiah was subsequently appointed and currently serves as the Authority's president and chief executive officer effective March 14, 2013. Mr. Jeremiah is also serving as the Authority's administrative receiver until the new nine-member board of commissioners officially begins.

RESULTS OF REVIEW

The Authority engaged in the prohibited practice of using Federal funds for lobbying and Carl R. Greene, the former executive director, certified that it did not do so. In addition, Mr. Greene falsely certified on at least five occasions that the Authority did not use non-Federal funds for lobbying activities.

Lobbying Disclosure Act of 1995

According to the Lobbying Disclosure Act, lobbyists are required to register with both Houses of Congress and provide quarterly disclosures on lobbying done for each client. In addition, lobbying firms must provide an estimate of the total income received for each client, including payments received from other persons or parties for lobbying activities on behalf of the client. The U.S. Senate Office of Public Records receives, processes, maintains and makes this information available to the public in its Lobbying Disclosure Act database. The database currently shows that American Continental Group, LLC, reported it received \$660,000 from the Authority between 2006 and 2010.

The Act defines "lobbying activities" as lobbying contacts and efforts in support of such contacts, including preparation and planning activities; research and other background work that is intended at the time it is performed, for use in contacts; and coordination with the lobbying activities of others.

Lobbying Funding Restrictions and Disclosure Requirements

According to regulations at 24 CFR (Code of Federal Regulations) 87, Federal funds may not be used for lobbying in connection with any Federal contract, grant, loan, or cooperative agreement; or the extension, continuation, renewal, amendment, or modification of the same. The regulations also require recipients of more than \$100,000 in Federal funds or more than \$150,000 in Federal loans to file a certification that Federal funds will not be used for lobbying, and also to file a disclosure if lobbying activities have been, or will be done with non-Federal funds.

Report 2011-PH-1007³ Revealed Federal Funds Paid for Lobbying

In audit report 2011-PH-1007 we reported that the Authority's payments to outside attorneys did not comply with HUD regulations and other applicable requirements. Specifically, the Authority did not adequately support \$4.5 million that it paid to outside attorneys during the period April 2007 to August 2010, virtually the entire amount we reviewed, raising questions about the

³ See footnote 1.

propriety of the remaining \$26 million in payments that we did not review. The Authority made unreasonable and unnecessary payments of \$1.1 million to outside attorneys to obstruct the progress of HUD OIG audits. During and after this audit the Authority failed to cooperate and failed to provide adequate, un-redacted invoices despite the fact that we were compelled to serve the Authority's former Executive Director and HUD administrative receiver Michael Kelly with a subpoena on December 10, 2010.³ The Authority did not originally comply with the subpoena and refused to provide the majority of the supporting documentation that we demanded in the subpoena. On March 4, 2011, the Authority and HUD entered into a "Cooperative Endeavor Agreement." Under the Cooperative Endeavor Agreement, HUD appointed Estelle Richman, HUD's Chief Operating Officer, to serve as the sole member of the Authority's Board of Commissioners. On March 24, 2011, Ms. Richman directed Mr. Kelly to release to HUD un-redacted invoices for any legal services paid for by the Authority from 2005 to the present.

The process of releasing the legal invoices to HUD and the OIG continued to be obstructed because in response to Ms. Richman's directive, the Authority's former executive director Carl R. Greene filed a motion on April 4, 2011, for a Temporary Restraining Order and Preliminary Injunction against the Authority, Mr. Kelly, and Ms. Richman to prevent the release of the invoices. The District Court ordered, however, on June 20, 2011, that the Authority was required to release the invoices to HUD. Carl R. Greene subsequently appealed that ruling, further delaying the release of the invoices. On June 7, 2012, the United States Court of Appeals for the Third Circuit affirmed the District Court's order that the invoices should be released. On July 3, 2012, 18 months after the subpoena was served, the Authority complied with the subpoena.

Based on our review of invoices that we ultimately obtained from the court order enforcing the OIG subpoena, we determined that the Authority engaged in lobbying activities with Federal funds through two law firms (Ballard Spahr, LLP and Wolf Block Schorr and Solis-Cohen, LLP), and that it spent at least \$48,500 in Federal funds on these lobbying activities identified on nine invoices. The Authority acknowledged that it used Federal funds to pay these nine invoices and HUD agreed to require the Authority to repay the \$48,500 from non-Federal funds. The Authority paid \$47,300 of the \$48,500 in lobbying expenses with Federal funds through Ballard Spahr, LLP. Activities reflected on the invoices typically included research, planning, and preparation for lobbying. Excerpts from some of the invoices are shown as examples in appendix A.

OIG Internal Audit Identified False Lobbying Certifications

As part of our ongoing internal audit of HUD's oversight of public housing authorities' compliance with Federal lobbying disclosure requirements and restrictions regarding funds used for lobbying, we selected the Authority (a participant in the Moving to Work Demonstration program⁴) as part of a survey sample of five housing authorities for review. We found that the

⁴ In 1996, Congress authorized the Moving to Work Demonstration program as a HUD demonstration program. This program allowed certain housing authorities to design and test ways to promote self-sufficiency among assisted households, achieve programmatic efficiency, reduce costs, and increase housing choice for low-income households. Congress exempted participating housing authorities from much of the Housing Act of 1937 and associated regulations as outlined in the Moving to Work agreements. Participating housing authorities have considerable flexibility in determining how to use Federal funds. In December 2000, the Authority submitted an application to HUD to enter the program, and in February 2002, HUD signed a 7-year agreement with the Authority that was

Authority's former executive director, Mr. Greene, falsely certified that it had not, and would not use Federal funds for lobbying. In addition, Mr. Greene falsely certified that the Authority did not use non-Federal funds for lobbying activities.⁵ Examples of the false certifications are shown in appendix B. As discussed above, the Authority spent Federal funds on lobbying done through law firms. Also, to date, expense records and invoices we reviewed have identified that the Authority paid two consulting firms (American Continental Group, LLC, and Gmerek Government Relations, Inc.) to lobby on its behalf. Both firms' Web sites indicate a focus on government relations/affairs.

Our review of expense records and payments for lobbying noted in relation to the two consulting firms has identified thus far that the Authority spent \$150,000 on lobbying activities identified on 15 invoices from American Continental Group, LLC, and about \$35,000 on lobbying activities identified on 29 invoices from Gmerek Government Relations, Inc.. Eighteen of the Gmerek invoices specifically stated that the invoices were for lobbying. Details on the remaining 11 invoices indicated that they were for "government relations." In addition to activities including legislative monitoring; meetings and discussions with congressional representatives and staff; and research, planning, preparation for lobbying some of the invoices also detailed lobbying efforts to expand and extend the Authority's participation in the Moving to Work program. According to the detail on the invoices, the \$185,000 billed by the two firms should have been paid with non-Federal funds. To date, the Authority has failed to provide documentation or accounting records to substantiate that it used non-Federal funds to pay these lobbying services. Examples of these invoices are shown in appendixes C and D.

KPMG Audit

HUD retained KPMG, LLP, on February 21, 2011, to conduct a forensic audit of the Philadelphia Housing Authority. The KPMG audit identified that the Authority paid at least \$662,183 for lobbying from December 2005 through June 2009 through two law firms and directly to the lobbying organizations. KPMG also found no evidence that any lobbyists were noted on the Authority's "Disclosure of Lobbying Activities"⁶ and "Certifications of Payments to Influence Federal Transactions."⁷

KPMG reported the following lobbying activities at the Authority:

retroactive to April 2001. From April to October 2008, the Authority continued to operate under a HUD-developed plan to transition back to traditional HUD program regulations because the term of its Moving to Work agreement had expired. In October 2008, HUD entered into a new 10-year Moving to Work agreement with the Authority. The expiration date of the Authority's new agreement is March 2018.

⁵ Mr. Greene's certifications were for plan years 6 through 10 (fiscal years 2007 through 2011) under the Authority's Moving to Work program.

⁶ Standard Form LLL

⁷ Form HUD 50071

Entity	Owner/ consultant	Political position held	PHA amounts paid	Description
American Continental Group, LLC	David Urban	Former Chief of Staff for Senator Arlen Specter	\$407,638	Amounts paid directly to American Continental Group, LLC from December 2005 to September 2008
Wolf Block Government Relations, LP & Gmerek Government Relations, Inc.	Richard Gmerek	Former Counsel to PA Republican State Majority Leader	\$231,864	\$199K paid to Wolf Block Government Relations, LP and \$32K paid directly to Gmerek Government Relations, Inc.
Venn Strategies, LLC	Penny Lee	Former communications director to Pennsylvania Governor Ed Rendell and more recently to Senator Harry Reid	\$22,681	Three Venn invoices for May, June, and July 2009 traced to Philadelphia Housing Authority payments to Ballard Spahr for the subcontracted work

RECOMMENDATIONS

We recommend that HUD's Associate General Counsel for Program Enforcement

- 1A. Pursue remedies under the Program Fraud Civil Remedies Act against the Authority's former executive director Carl R. Greene for falsely certifying to HUD that the Authority did not participate in lobbying activities.
- 1B. Take administrative action up to and including debarment against the Authority's former executive director Carl R. Greene for falsely certifying to HUD that the Authority did not participate in lobbying activities.

We recommend that the Director of HUD's Pennsylvania State Office of Public Housing

- 1C. Ensure that responsible Authority officials are formally trained in lobbying disclosure requirements and restrictions.
- 1D. Ensure that all future HUD monitoring of the Authority covers compliance with Federal lobbying disclosure requirements and restrictions.

Appendix A

SAMPLE EXCERPTS FROM LAW FIRMS' INVOICES

BALLARD SPAHR LLP
1735 MARKET STREET, 5TH FLOOR
PHILADELPHIA, PA 19103-7599
TEL 215.885.8500
FAX 215.884.8599

TAX IDENTIFICATION NO. 1

Invoice Date: August 25, 2007
Invoice No.: 2007082133

The Philadelphia Housing Authority
Contracts Administration Department
P.O. Box 8737
Philadelphia, PA 19104

Client: Philadelphia Housing Authority - Real Estate Matte (15050.05)
Matter: Housing Policy Matters (046232)
Re: Contract No. P-003486-1
PAY WITH NON-FEDERAL FUNDS

For Professional Services Rendered through July 31, 2007:

Total Fees	\$7,606.50
Total Current Charges	\$7,606.50
Total Due This Invoice	<u>\$7,606.50</u>

Example 1: Invoice #2007082133 Page 1 of 4

PHA 004464

<u>NAME</u>	<u>DATE</u>	<u>HOURS</u>	<u>DESCRIPTION</u>
SW Geno	07/09/07	1.20	Telephone conversation and emails with D. Urban and T. Rodill regarding MTW extension; review language regarding same; telephone conversation with G. Bowens and C. Greene regarding same
MG Polwell	07/10/07	.10	Summarize LIHTC issues for S.Geno
SW Geno	07/10/07	2.10	Review appropriations bills and summary of same
A Glassman	07/10/07	.20	Conference with S. Geno regarding HUD appeal
MG Polwell	07/11/07	.60	Summarize tax credit suggestions
MG Polwell	07/11/07	.40	Review information for Administrative Reform Initiative meetings
SW Geno	07/11/07	.80	Telephone conversation with G. Bowens regarding appropriations legislation and update on MTW extension; confer with C. Greene regarding same
A Glassman	07/11/07	.30	Prepare for administrative reform meeting
A Glassman	07/12/07	.40	Telephone conversation with C. Greene and C. Wellenkamp regarding MTW extension language; emails regarding same
MG Polwell	07/13/07	.10	Research House Appropriations bill

15050.05-046232 (RR013)
SW Geno

3

2007082133
August 25, 2007

Note: D. Urban and T. Rodill are registered lobbyists

PHA 004466

Invoice #2007082133 Page 2 of 4

<u>NAME</u>	<u>DATE</u>	<u>HOURS</u>	<u>DESCRIPTION</u>
MG Folwell	07/13/07	.80	Summarize MTW portion of SEVRA introduced on the House floor
MG Folwell	07/16/07	1.70	Summarize changes to MTW bill
MG Folwell	07/16/07	1.40	Summarize House and Senate T-THUD appropriations bill
SW Geno	07/16/07	.80	Review and respond to e-mails regarding SEVRA legislation and review of same
MG Folwell	07/17/07	1.30	Research MTW language in prior appropriations bills
MG Folwell	07/17/07	.90	Summarize changes to MTW bill; draft summary; edit memorandum summarizing bill; e-mail summary to G. Owens and S. James
SW Geno	07/18/07	.50	Telephone conversation with and emails with T. Rodill, D. Urban regarding MTW extension
A Glassman	07/18/07	.20	Review HUD Notice on leveraging capital and operating funds
MG Folwell	07/19/07	.20	Review and summarize Section 8 portions of SEVRA
MG Folwell	07/19/07	1.50	Draft one page summary of MTW and need to delay asset management fee requirements
SW Geno	07/19/07	1.50	Attend meeting with T. Rodill, M. Kelly regarding MTW extension and preparation for same
MG Folwell	07/20/07	.20	Draft summary of Section 8 portion of SEVRA.

15050.05-046232 (RE013)
SW Geno

4

2007082133
August 25, 2007

PHA 004467

<u>NAME</u>	<u>DATE</u>	<u>HOURS</u>	<u>DESCRIPTION</u>
SN Geno	07/23/07	.60	Telephone conversation with G. Bowens, C. Wellenkamp and T. Rodill regarding MTW strategy and follow up e-mails regarding same
MW Smith-Mack	07/23/07	.30	Review final e-alert
MG Polwell	07/24/07	.40	Review CSPAN and Thomas for information on proposed MTW amendment
MG Polwell	07/25/07	1.30	Review floor amendments to House T-THUD appropriations bill; e-mail MTW amendment to S. Geno
SN Geno	07/25/07	1.10	Review and respond to e-mails regarding appropriations and MTW extension; review legislative material regarding same; telephone conversation with G. Bowens regarding same
SN Geno	07/25/07	.60	Conference with C. Greene regarding MTW extension and housing policy issues
SN Geno	07/30/07	.40	Review legislative material
MG Polwell	07/31/07	.80	Review House and Senate Appropriations bills; review A. Glasman's summary of MTW Appropriation and legislative status; draft comments to status
MG Polwell	07/31/07	.60	Summarize MTW administrative provisions in House and Senate versions of T-THUD appropriations bills

15050.05-046232 (RE013)
SN Geno

5

2007082133
August 25, 2007

BALLARD SPAHR LLP
1735 MARKET STREET, 51st FLOOR
PHILADELPHIA, PA 19103-7599
TEL 215.685.8500
FAX 215.661.8999

TAX IDENTIFICATION NO.

Invoice Date: September 28, 2007
Invoice No.: 2007091731

The Philadelphia Housing Authority
Contracts Administration Department
P.O. Box 8737
Philadelphia, PA 19104

Client: Philadelphia Housing Authority - Real Estate Matte (15050.05)
Matter: Housing Policy Matters (046232)
Re: Contract No. P-003486-I
PAY WITH NON-FEDERAL FUNDS

For Professional Services Rendered through August 31, 2007:

Total Fees	\$10,321.50
Total Current Charges	\$10,321.50
Total Due This Invoice	<u>\$10,321.50</u>

PHA 004415

Example 2: Invoice #2007091731 Page 1 of 3

<u>NAME</u>	<u>DATE</u>	<u>HOURS</u>	<u>DESCRIPTION</u>
SW Geno	08/15/07	1.00	E-mails regarding tour for Congressional staff; review legislative material
MG Folwell	08/16/07	3.90	Review Housing Trust Fund as approved by House Financial Service Committee; draft recommendations on involvement of PHAs in production of housing funded by HTP
SW Geno	08/16/07	.50	Telephone conversation with C. Greene regarding appropriations issues
MG Folwell	08/18/07	1.80	Review amendments made in committee to HHTF legislation
SW Geno	08/21/07	.30	E-mail and telephone conversation with T. Rodill regarding staff tour of PHA sites
SW Geno	08/21/07	.30	Review and respond to e-mails regarding MTW extension
SW Geno	08/21/07	.90	Review legislative materials regarding appropriations
MG Folwell	08/22/07	1.60	Draft HPTF summary
SW Geno	08/22/07	.40	Confer with K. Dorn regarding resident summit
SW Geno	08/22/07	.70	Review legislative material
SW Geno	08/22/07	.30	Review and respond to e-mails regarding MTW extension
SW Geno	08/23/07	.30	Telephone conversation with T. Rodill regarding MTW extension
15050.05-04 6232 (RB013) SW Geno		3	2007091731 September 28, 2007

PHA 004417

Invoice #2007091731 Page 2 of 3

<u>NAME</u>	<u>DATE</u>	<u>HOURS</u>	<u>DESCRIPTION</u>
SW Geno	08/23/07	.40	Prepare for resident empowerment presentation on MTW
SW Geno	08/24/07	4.00	Prepare for and attend resident empowerment conference and give presentation on MTW
SW Geno	08/24/07	1.30	Travel to/from Philadelphia regarding resident empowerment conference less time spent on other matters
SW Geno	08/24/07	.20	E-mails with T. Rodill regarding MTW extension
SW Geno	08/27/07	1.10	Review and respond to e-mails regarding tour with M. Kelly; telephone conversation with S. James and A. Glassman regarding same
A Glassman	08/28/07	.90	Prepare for site visits with Congressional staff
A Glassman	08/28/07	3.90	Participate in site visits with Congressional staff
A Glassman	08/28/07	1.10	Draft summary of site visits with Congressional staff
A Glassman	08/28/07	.30	Telephone calls with S. James regarding site visits with Congressional staff
SW Geno	08/29/07	.80	Review and respond to e-mails regarding housing policy issues and review legislative material
SW Geno	08/30/07	.20	Telephone conversation with S. James regarding legislative follow up

15050.05-046232 (RE013)
SW Geno

4

2007091731
September 28, 2007

PHA 004418

Invoice #2007091731 Page 3 of 3

BALLARD SPAHR LLP
1735 MARKET STREET, 51st FLOOR
PHILADELPHIA, PA 19103-7599
TEL 215.865.8500
FAX 215.864.8999

TAX IDENTIFICATION NO.

Invoice Date: November 10, 2007
Invoice No.: 2007110867

The Philadelphia Housing Authority
Contracts Administration Department
P.O. Box 8737
Philadelphia, PA 19104

Client: Philadelphia Housing Authority - Real Estate Matte (15050.05)
Matter: Housing Policy Matters (046232)
Re: Contract No. P-003486-I
PAY WITH NON-FEDERAL FUNDS

For Professional Services Rendered through October 31, 2007:

Total Fees	\$9,495.00
Total Disbursements	\$6.40
Total Current Charges	\$9,501.40
Total Due This Invoice	<u>\$9,501.40</u>

PHA 004532

Example 3: Invoice #2007110867 Page 1 of 3

Client: Philadelphia Housing Authority - Real Estate Matte (15050.05)
 Matter: Housing Policy Matters (046232)
 Re: Contract No. P-003486-I
 PAY WITH NON-FEDERAL FUNDS

For Professional Services Rendered through October 31, 2007:

<u>NAME</u>	<u>DATE</u>	<u>HOURS</u>	<u>DESCRIPTION</u>
EC Calhoun	10/03/07	2.00	Research current legislation regarding HOPE VI Reauthorization; draft summary
MG Polwell	10/03/07	1.40	Review amendments to HOPE VI legislation; revise memorandum
SW Geno	10/03/07	.50	Telephone conference with T. Rodill, S. James and M. Delapenha regarding meeting with Senate staff regarding MLK; e-mails regarding same
MG Polwell	10/04/07	.60	Review summary of Senate version of SEVRA
MG Polwell	10/04/07	.70	Review asset management legislation, H.R. 3521; draft memo summarizing legislation
MG Polwell	10/04/07	3.40	Edit memorandum on HOPE VI legislation.
SW Geno	10/04/07	.40	Telephone conference with and e-mail to T. Rodill and D. Urban.
EC Calhoun	10/05/07	1.20	Coordinate with MG Polwell regarding HOPE VI Reauthorization e-alert; revise same

15050.05-046232 (RE013)
 SW Geno

2

2007110867
 November 10, 2007

PHA 004533

<u>NAME</u>	<u>DATE</u>	<u>HOURS</u>	<u>DESCRIPTION</u>
MG Folwell	10/29/07	.50	Review Housing Trust Fund legislation; edit memo summarizing legislation.
MG Folwell	10/30/07	.60	Review Housing Trust Fund legislation; edit memo summarizing legislation
SW Geno	10/30/07	2.00	Prepare talking points for meeting with Congressional delegation
MV Smith-Mack	10/30/07	.20	Respond to e-mails regarding 27B closing form J. Bien and D. Jefferson; send out HUD release to title company
MG Folwell	10/31/07	.90	Review operating subsidy regulations; guidance; e-mail information to S. Geno
SW Geno	10/31/07	1.60	Meeting with State coalition regarding State operating fund legislation; confer with C. Greene regarding same
SW Geno	10/31/07	.70	Confer with D. Urban regarding meeting on the Hill

36.90 Total Hours

TIMEKEEPER SUMMARY

<u>NAME</u>	<u>TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
SW Geno	Partner	8.00	345.00	2,760.00
MV Smith-Mack	Of Counsel	5.70	345.00	1,966.50
MG Folwell	Associate	18.90	225.00	4,252.50
EC Calhoun	Paralegal	4.30	120.00	516.00
Total Fees				\$9,495.00

15050.05-046232 (RE013)
SW Geno

5

2007110867
November 10, 2007

PHA 004536

Invoice #2007110867 Page 3 of 3

BALLARD SPAHR LLP
1735 MARKET STREET, 31st FLOOR
PHILADELPHIA, PA 19103-7599
TEL 215.663.8000
FAX 215.664.8999

TAX IDENTIFICATION NO.:

Invoice Date: January 27, 2010
Invoice No.: 2010016183

The Philadelphia Housing Authority
Contracts Administration Department
P.O. Box 8737
Philadelphia, PA 19104

Client: Philadelphia Housing Authority - Real Estate Matte (15050.05)
Matter: Housing Policy Matters (046232)
Re: Contract No. P-003486-I
PAY WITH NON-FEDERAL FUNDS

For Professional Services Rendered through January 1, 2010:

Total Disbursements	\$10,000.44
Total Current Charges	\$10,000.44
Total Due This Invoice	<u>\$10,000.44</u>

PHA 005211

Example 4: Invoice #2010016183 Page 1 of 3

1/29/2010 - 11:37 AM

MASTER WORK IN PROGRESS REPORT

PAGE 1

BILLING COORDINATOR: SW Gero

UNBILLED DISBURSEMENT DETAIL

CLIENT: Philadelphia Housing Authority - Real Estate Matter
MATTER: Housing Policy Matters

15055.05
046232
#2013

INVOICE NO.: 2010016183
RELATIONSHIP PARTNER: JS Easley
MATTER BILLING ATTORNEY: SW Gero

DISBURSEMENTS				
WORK	ACTIVITY DATE	DISB CODE	AMOUNT	DISBURSEMENT DESCRIPTION
A Accounting	12/30/09	2	.44	Postage
SW Gero	01/01/10	15	10,000.00	Professional Services American Continental Group, Inc. For 01031 professional services rendered
			10,000.44	UNBILLED DISBURSEMENTS

PHA 005214

Invoice #2010016183 Page 2 of 3

American Continental Group, Inc.
900 19th Street, NW
Suite 800
Washington, DC 20006
202-327-8100

INVOICE

Tax ID /

To:	From:
Sharon Wilson Geno	David Urban
Ballard Spahr Andrews & Ingersoll, LLP	Date
601 13th Street, NW	1/1/2010
Suite 1000 South	Invoice #
Washington, DC 20005	01031

Our fee plus expenses for consulting services rendered on behalf of Philadelphia Housing Authority for January 2010. 10,000.00

The following is a brief summary of the actions undertaken by ACG on behalf of PHA for the month of December 2009:

- 1) Weekly strategy calls/discussions with PHA Executive Director and Chief of Staff
- 2) Discussions with staff re possible sources for public safety funding
- 3) Discussions with staff re Medicaid Waiver Pilot Program
- 4) Discussions with staff re energy efficiency projects/smart energy technology
- 5) Follow-up with staff after Secty visit to Phila re PHA projects
- 6) Discussions with Drexel University re PHA partnership efforts

Please make check payable to American Continental Group and indicate Invoice # on payment. Thank you.

TOTAL DUE	\$10,000.00
-----------	-------------

Note: American Continental Group (ACG) is a registered lobbying firm.

PHA 005217

Invoice #2010016183 Page 3 of 3

Appendix B

EXAMPLES OF CERTIFICATIONS AND DISCLOSURES SIGNED BY CARL R. GREENE

Certification of Payments to Influence Federal Transactions U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Applicant Name
Philadelphia Housing Authority

Program/Activity Receiving Federal Grant/Funding
Moving to Work Plan Year Six

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official Carl R. Greene	Title Executive Director
Signature 	Date (mm/dd/yyyy) 02/02/2006

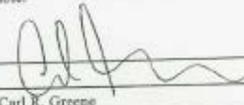
Previous edition is obsolete. form HUD 50071 (3/98)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

Note: This certification for plan year 6 of the Authority's Moving to Work program included its fiscal year beginning April 1, 2006 and ending March 31, 2007.

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Not Applicable		
6. Federal Department/Agency: U.S. Department of Housing and Urban Development			7. Federal Program Name/Description: MTW Year Six Plan CFDA Number, if applicable: 14.870		
8. Federal Action Number, if known:			9. Award Amount, if known: \$		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): Not Applicable.			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): Not Applicable.		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the fee above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature:  Print Name: Carl R. Greese Title: Executive Director Telephone No.: (215) 684-4174 Date: 02/02/06		
Federal Use Only:			Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)		

Note: This disclosure for plan year 6 of the Authority's Moving to Work program included its fiscal year beginning April 1, 2006 and ending March 31, 2007.

**Certification of Payments
to Influence Federal Transactions**

U.S. Department of Housing
and Urban Development
Office of Public and Indian Housing

Applicant Name

Philadelphia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Plan Year Seven

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-L.L.L. Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Carl R. Grogan

Title

Executive Director

Signature



Date (mm/dd/yyyy)

03/09/2007

Previous edition is obsolete

form HUD 50171 (3/98)
ref: Handbook 7417.1, 7475.13, 7485.1, & 7485.3

Note: This certification for plan year 7 of the Authority's Moving to Work program included its fiscal year beginning April 1, 2007 and ending March 31, 2008.

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0048

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: _____ Congressional District, if known: 2nd			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Not Applicable Congressional District, if known: _____		
6. Federal Department/Agency: U.S. Department of Housing and Urban Development			7. Federal Program Name/Description: CFDA Number, if applicable: 14.870		
8. Federal Action Number, if known:			9. Award Amount, if known: \$ _____		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): Not Applicable			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): Not Applicable		
11. Information requested through this form is withheld by the 31 U.S.C. section 1352. The disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the for above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature:  Print Name: Cab-R. Greene Title: Executive Director Telephone No.: (215) 684-4174 Date: 03/09/2007		
Federal Use Only:				Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	

Note: This disclosure is for plan year 7 of the Authority's Moving to Work program which included its fiscal year beginning April 1, 2007 and ending March 31, 2008.

Appendix C

GMEREK INVOICE EXAMPLES

		Gmerek Government Relations, Inc.	
<p>The Locust Court Building, 212 Locust Street Suite 600, Harrisburg, PA 17101 Tel: (717) 234-8525 ■ Fax: (717) 234-8812 ■ www.ggrgov.com Invoice submitted to: PHILADELPHIA HOUSING AUTHORITY ATTN: CONTRACT ADMINISTRATOR PO BOX 4737 PHILADELPHIA, PA 19104-9742</p>			
<p>July 07, 2009</p>			
<p>In Reference To: P-003486H - Lobby *PAY ONLY WITH NON-FEDERAL FUNDS*</p>			
<p>Invoice # 10094</p>			
Professional Services			
		<u>Hrs/Rate</u>	<u>Amount</u>
5/1/2009	CPL Conference with client DIRECT - Telephone communication with Executive/Administrative office regarding funding agreements with PHA.	0.80 185.00/hr	111.00
	CPL Conference with client DIRECT - Telephone communication with Executive/Administrative office regarding PennDot funding for Mill Creek Community.	0.30 185.00/hr	55.50
5/4/2009	CPL Letter to client INDIRECT - Draft correspondence to client regarding blighted properties legislation.	0.30 185.00/hr	55.50
	CPL Conference with client DIRECT - Telephone communication with legislator/staff regarding blighted properties legislation.	0.40 185.00/hr	74.00
5/5/2009	CPL Conference with client INDIRECT - Communication with client regarding blighted properties legislation.	0.40 185.00/hr	74.00
	CPL Letter to client INDIRECT - Draft correspondence to client regarding DCED hearing on weatherization proposal.	0.30 185.00/hr	55.50
5/7/2009	CPL Conference with client INDIRECT - Communication with client regarding funding issues update; Draft internal correspondence regarding client call update.	0.90 185.00/hr	166.50
	CPL Conference with client DIRECT - Telephone communication with Executive/Administrative office regarding Hometown Streets grant project.	0.40 185.00/hr	74.00
<p>Example 1: Invoice # 10094 Page 1 of 3</p>			

PHILADELPHIA HOUSING AUTHORITY

		<u>Hrs/Rate</u>	<u>Amount</u>
5/12/2009	CPL Conference with client DIRECT - Telephone communication with legislator/staff regarding blighted properties legislation.	0.40 185.00/hr	74.00
5/13/2009	CPL Letter to client Draft correspondence to client regarding Federal Stimulus Oversight Committee.	0.40 185.00/hr	74.00
	DPL Conference with client DIRECT - Telephone communication with legislator/staff regarding Federal Stimulus Oversight Committee.	0.60 185.00/hr	111.00
5/18/2009	CPL Letter to client DIRECT - Draft correspondence to client regarding federal stimulus funding.	0.80 185.00/hr	148.00
5/19/2009	CPL Letter to client INDIRECT - Draft correspondence to client regarding PennDot funding.	0.40 185.00/hr	74.00
5/28/2009	CPL Conference with client DIRECT - Telephone communication with legislator/staff regarding grant funding.	0.30 185.00/hr	55.50
6/2/2009	CPL Meeting DIRECT - Attend meetings on Hill regarding client issues.	0.30 185.00/hr	55.50
6/3/2009	CPL Conference with client DIRECT - Telephone communication with legislator/staff regarding constituent inquiries.	0.30 185.00/hr	55.50
6/9/2009	CMC Conference with client DIRECT - Attend Senate Republican event.	0.10 185.00/hr	18.50
6/15/2009	CPL Letter to client. INDIRECT - Draft correspondence to Tony Lepore regarding capital budget.	0.40 185.00/hr	74.00
6/23/2009	CPL Letter to client INDIRECT - Draft correspondence to client regarding weatherization funding.	0.40 185.00/hr	74.00
8/25/2009	CPL Conference with client DIRECT - Telephone communication with legislator/staff regarding assisted living regulations.	0.40 185.00/hr	74.00

PHILADELPHIA HOUSING AUTHORITY

	Hrs/Rate	Amount
6/29/2009 CPL DIRECT DIRECT- Attend meetings on Hill regarding Senate Bill 900.	2.10 185.00/hr	388.50
CPL DIRECT DIRECT- Attend meetings on Hill regarding capital budget funding.	0.30 185.00/hr	55.50
6/30/2009 CPL DIRECT DIRECT- Attend meetings on Hill regarding Senate Bill 900.	1.50 185.00/hr	277.50
CPL DIRECT DIRECT- Draft correspondence to Hill regarding Senate Bill 900 talking points for Senator Kitchen.	0.80 185.00/hr	148.00
7/2/2009 RJG Meeting DIRECT: Meeting with Senator Tomlinson regarding various issues.	0.20 255.00/hr	51.00
For professional services rendered	13.30	\$2,474.50
Balance due		\$2,474.50

Name	Hours	Rate	Amount
Richard J. Gmerek	0.20	255.00	\$51.00
Chris P. Lammendo	13.00	185.00	\$2,405.00
Calharine M. Conner	0.10	185.00	\$18.50

*PK. pay this
and any
for
12-23-09*

The Locust Court Building, 212 Locust Street Suite 600, Harrisburg, PA 17101
 Tel: (717) 234-8525 ■ Fax: (717) 234-8812 ■ www.ggrgov.com

Invoice submitted to:
 PHILADELPHIA HOUSING AUTHORITY
 ATTN: CONTRACT ADMINISTRATOR
 PO BOX 8737
 PHILADELPHIA, PA 19104-9742



August 05, 2009

In Reference To: P-003486H - Lobby
 "PAY ONLY WITH NON-FEDERAL FUNDS"

Invoice # 10107

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
7/8/2009	CPL DIRECT DIRECT- Communication with legislator/staff regarding Senate Bill 90, blighted properties legislation and status of amendments.	0.40 185.00/hr	74.00
7/10/2009	RJG Meeting DIRECT: Conversation with Representative Gerber and Representative Petrarca regarding Budget.	0.20 255.00/hr	51.00
7/14/2009	CPL DIRECT DIRECT- Communication with legislator/staff regarding capital budget funding.	0.70 185.00/hr	129.50
7/17/2009	CPL DIRECT DIRECT- Attend meetings on Hill regarding client issues.	0.70 185.00/hr	129.50
	CPL DIRECT DIRECT- Attend meetings on Hill regarding blighted properties legislation.	0.50 185.00/hr	92.50
7/21/2009	CPL DIRECT DIRECT- Attend meetings on Hill regarding Senate Bill 100, blighted properties legislation.	0.80 185.00/hr	148.00
7/24/2009	CPL DIRECT DIRECT- Communication with legislator/staff regarding amendments to Senate Bill 900, blighted properties legislation.	0.40 185.00/hr	74.00
7/27/2009	CPL DIRECT DIRECT- Attend meetings on Hill regarding grant program.	0.70 185.00/hr	129.50

Example 2: Invoice # 10107 Page 1 of 2

	<u>Hrs/Rate</u>	<u>Amount</u>
7/30/2009 RJG Letter to client DIRECT: Conversations on Hill with Randy Albright and Senator Hughes regarding issues.	0.70 255.00/hr	178.50
For professional services rendered	5.10	\$1,006.50
Previous balance		\$2,474.50
Balance due		\$3,481.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Richard J. Gmerek	0.90	255.00	\$229.50
Chris P. Lammando	4.20	185.00	\$777.00

PB. pay this
amt.
[Signature]

Gmerek Government Relations, Inc.

The Locust Court Building, 212 Locust Street Suite 600, Harrisburg, PA 17101
 Tel: (717) 234-8525 ■ Fax: (717) 234-8812 ■ www.ggrgov.com

Nisha Pathak - Dame

Invoice submitted to:
 PHILADELPHIA HOUSING AUTHORITY
 ATTN: CONTRACT ADMINISTRATOR
 PO BOX 8737
 PHILADELPHIA, PA 19104-9742

RECEIVED
 OCT 14 2009
 CONTRACT ADMINISTRATION

October 09, 2009
 In Reference To: P-003486H - Government Relations
 "PAY ONLY WITH NON-FEDERAL FUNDS"
 Invoice # 10234

Professional Services

		Hrs/Rate	Amount
8/7/2009	CPL Conference with client Communication with client regarding Mantua Hall funding.	0.10 185.00/hr	18.50
9/1/2009	RJG Phone call from client Telephone call to Carl Greene regarding Mantua Hall and review documents from Stephanie Pastula regarding Historical landmarks.	0.70 255.00/hr	178.50
9/8/2009	RJG Conference with client Conversation with John Estey regarding Mantua Hall.	0.20 255.00/hr	51.00
	CPL Conference with client Communication with client regarding Historical Museum Commission.	0.40 185.00/hr	74.00
9/9/2009	CPL Conference with client Communication with client regarding issue update.	0.60 185.00/hr	111.00
9/10/2009	CMC Review Review legislation, committee meetings, amendments and newspaper articles.	0.20 185.00/hr	37.00
	CMC Letter to client Draft correspondence to client regarding Governor Rendell press conference.	0.20 185.00/hr	37.00
	RJG Phone call from client Telephone calls to and from Carl Greene regarding Mantua Hall.	0.40 255.00/hr	102.00
9/16/2009	CMC Review Reviewed legislation, amendments, committee meetings and newspaper articles.	0.20 185.00/hr	37.00

Example 3: Invoice # 10234 Page 1 of 3

		<u>Hrs/Rate</u>	<u>Amount</u>
9/16/2009	CMC Meeting Monitored House session.	0.10 185.00/hr	18.50
9/17/2009	RJG Letter to client On Hill regarding HB 1828 and correspondence with Carl Greene's office regarding the same.	0.40 255.00/hr	102.00
	CMC Review Reviewed bill amendments, committee meetings, press conferences and newspaper articles.	0.20 185.00/hr	37.00
9/21/2009	CPL Conference with client Communication with client regarding client issues.	0.20 185.00/hr	37.00
9/24/2009	RJG Meeting Prepare for and attend bi-weekly call with Carl Greene.	0.70 255.00/hr	178.50
	CPL Conference with client Participate on conference call with client.	0.60 185.00/hr	111.00
9/25/2009	RJG Meeting Telephone call from Carl Greene regarding Mantua Hall and other issues.	0.20 255.00/hr	51.00
	CMC Letter to client Prepared budget update to send to client.	0.20 185.00/hr	37.00
For professional services rendered		5.60	\$1,218.00
Additional Charges :			
		<u>Qty/Price</u>	
9/30/2009	RJG Copying cost	16	3.20
	Copying cost	0.20	
	RJG Long distance charges	1	4.24
	Long distance charges	4.24	
Total additional charges			\$7.44
Total amount of this bill:			\$1,225.44
Previous balance			\$9,357.77

Balance due

Amount
\$10,583.21

Timekeeper Summary

Name	Hour	Rate	Amount
Richard J. Gmerek	2.60	255.00	\$663.00
Chris P. Lammando	1.90	185.00	\$351.50
Catharine M. Conner	1.10	185.00	\$203.50

Pls. pay this
amt only
S. J. H.
12-28-09

Appendix D

ACG INVOICE EXAMPLES

AMERICAN CONTINENTAL GROUP LLC
SUITE 600
900 18TH STREET NW
WASHINGTON, D.C. 20006

(202) 327-8100
FAX (202) 327-8101
WWW.ACGEPCOM

INVOICE

RECEIVED
APR 07 2008
CONTINENTAL GROUP LLC

To: **Attn: Alicia Wilson**
Philadelphia Housing Authority
P.O. Box 8737
Philadelphia, PA 19104-9742

From: **David J. Urban**

Date: **4/1/2008**

Invoice # **18530**

Our fee plus expenses for consulting services rendered on behalf of Philadelphia Housing Authority for April 2008 10,000.00

The following is a brief summary of the actions undertaken by ACG on behalf of PHA for the month of March 2008:

- 1) Numerous discussions with Matt Kelly, Senator Specter's office, re 504 issue, extension of MTW program and HUD email "issue".
- 2) Numerous discussion with Jim Brown and other staff in Senator Casey's staff, re extension of MTW program, 504 issue, and HUD email "issue".
- 3) Discussions with Senator Specter regarding PHA situation re 504 issue, and MTW extension.

PHA Contract #063479

Please make check payable to American Continental Group and indicate invoice # on payment. Thank you.

TOTAL DUE \$10,000.00

*Pls. pay this
inst. only. R. J. Urban*

AMERICAN CONTINENTAL GROUP, LLC

SUITE 600
900 16TH STREET, NW
WASHINGTON, D.C. 20006

(202) 327-8100
FAX (202) 327-8101
WWW.ACGEPCOM

INVOICE

To:
Attn: Alicia Wilson
Philadelphia Housing Authority
P.O. Box 8737
Philadelphia, PA 19104-9742

From:
David J. Urban

Date:
5/1/2008

Invoice #
18608

Our fee plus expenses for consulting services rendered on behalf of Philadelphia Housing Authority for May 2008 10,000.00

The following is a brief summary of the actions undertaken by ACG on behalf of PHA for the month of April 2008:

- 1) Discussions with Jim Brown and other staff in Senator Casey's staff, re extension of MTW program and 504 issue.
- 2) Discussions with Scott Hoefflich and Matt Kelly in Senator Specter's office, re 504 issue and extension of MTW program.
- 3) Discussions with Stan White in Congressman Brady's office re extension of MTW program.



PEA Contract #003479

Please make check payable to American Cortinental Group and indicate Invoice # on payment. Thank you.

TOTAL DUE \$10,000.00

Pls pay the amount to GMM

Req 82227

AMERICAN CONTINENTAL GROUP, LLC

SUITE 800
900 19TH STREET NW
WASHINGTON, D.C. 20006

(202) 327-8100
FAX (202) 327-8101
WWW.ACCREBCOM

INVOICE

RECEIVED
JUN 10 2008
CONTRACT ADMINISTRATION

To:
Attn: Alicia Wilson
Philadelphia Housing Authority
P.O. Box 3737
Philadelphia, PA 19104-3742

From:
David J. Urban
Date:
6/1/2008
Invoice #
18689

Our fee plus expenses for consulting services rendered on behalf of Philadelphia Housing Authority for June 2008 10,000.00

The following is a brief summary of the actions undertaken by ACG on behalf of PHA for the month of May 2008:

- 1) Discussions with Congressman Brady's office re legislative extension of MTW program for PHA.
- 2) Discussions with Jim Brown re new HUD Secty hearing and PHA discussions with HUD/DoJ re resolution of MTW program and 504 issue.
- 3) Discussions with Scott Hoeflich re PHA discussions with HUD/DoJ re resolution of MTW program and 504 issue.

PEA Contract #603479

Please make check payable to American Continental Group and indicate invoice # on payment. Thank you.

APPROVED
7/11/08
SHEP
JESSUP
[Signature]

TOTAL DUE \$10,000.00